

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No: 1:23-cv-00108-LMB-JFA

**DEFENDANT GOOGLE LLC’S CONSOLIDATED RESPONSE
TO PLAINTIFFS’ AND NON-PARTIES’ MOTIONS TO SEAL AND
OBJECTIONS TO USE OF CONFIDENTIAL INFORMATION AT TRIAL**

Pursuant to the Court’s Order dated June 24, 2024 (Dkt. No. 871), Defendant Google LLC (“Google”) submits this Consolidated Response to Plaintiffs’ and Non-Parties’ Motions to Seal and Objections to Use of Confidential Information at Trial (collectively referred to as “Sealing Filings”). Dkt. Nos. 944, 946, 947, 948, 956, 957, 958, 959, 960, 961, 966, 968, 975, 977, 980, 982, 990, 1004, 1008, 1010, 1020, 1040, 1044, 1048, 1051, 1052, 1055, 1059, 1063, 1064.

Except as otherwise noted below, Google does not take a position on whether the information Plaintiffs and non-parties seek to protect from public disclosure at trial, as identified in the Sealing Filings, should remain under seal.

Certain non-parties propose redactions to certain summary charts on Defendant Google’s Trial Exhibit List (Dkt. No. 894), which contain figures derived, in part, from aggregated data from non-parties. Google is attempting to meet and confer with these non-parties with regard to these proposed redactions in an effort to reach an agreement that the

sealing of these summary charts is unnecessary. Google respectfully requests an opportunity to continue to pursue these discussions. Google will update the Court with the status of these discussions by 5:00pm EST on Wednesday, August 7.

In addition, Google intends to amend its Trial Exhibit List to remove DTX0896, DTX0911, DTX0915, DTX0999, DTX1010, and DTX1011, which non-party News Corp has requested be excluded from trial. *See* Dkt. No. 1057 at 9. News Corp's request with regard to these documents is therefore moot.

Dated: August 2, 2024

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